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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JORGE CALDERON-CAMPOS,

Defendant.

CASE NO. 1:22-CR-00130-JLT-SKO

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: August 10, 2022
TIME: 1:00 p.m.
COURT: Hon. Magistrate Judge Sheila K. Oberto

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was scheduled for a status conference on August 10, 2022.
2. By this stipulation, the parties move to continue the status conference until November 16, 2022, or the Court's earliest convenience, and to exclude time from calculation under the Speedy Trial Act between August 10, 2022, and November 16, 2022.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Initial discovery was provided to defendant on or about May 20, 2022, consisting of 1,082 Bates-stamped items including wiretap data, reports of investigation, photographs, recordings of post-arrest interviews, and a summary of defendant's criminal history.
 - b) Counsel for defendant desires additional time to review discovery, consult with

1 his client, conduct investigation and research related to the charges, and to otherwise prepare for
2 trial.

3 c) Counsel for defendant believes that failure to grant the above-requested
4 continuance would deny him the reasonable time necessary for effective preparation, taking into
5 account the exercise of due diligence.

6 d) Based on the above-stated findings, the ends of justice served by continuing the
7 case as requested outweigh the interest of the public and the defendant in a trial within the
8 original date prescribed by the Speedy Trial Act.

9 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
10 et seq., within which trial must commence, the time period of August 10, 2022 to November 16,
11 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it
12 results from a continuance granted by the Court at the defendant's request on the basis of the
13 Court's finding that the ends of justice served by taking such action outweigh the best interest of
14 the public and the defendant in a speedy trial.

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1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act provide that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

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6 Dated: August 1, 2022

PHILLIP A. TALBERT
United States Attorney

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9 /s/ CHRISTOPHER D. BAKER
CHRISTOPHER D. BAKER
Assistant United States Attorney

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11 /s/ DAVID A. TORRES
12 DAVID A. TORRES
13 Counsel for defendant Jorge Calderon-Campos

14 **ORDER**

15 IT IS SO ORDERED.

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19 DATED: 8/2/2022

Sheila K. Oberto

THE HONORABLE SHEILA K. OBERTO
UNITED STATES MAGISTRATE JUDGE